

**ROBINS KAPLAN LLP**

Michael A. Geibelson, Bar No. 179970  
2049 Century Park East, Suite 3400  
Los Angeles, CA 90067-3208  
Telephone: 310-552-0130  
Facsimile: 310-229-5800  
mgeibelson@robinskaplan.com

Christopher W. Madel, MN Reg. No. 230297  
Jennifer M. Robbins, MN Reg. No. 387745  
Matthew J.M. Pelikan, MN Reg. No. 393065  
800 LaSalle Avenue  
Suite 2800  
Minneapolis, MN 55402  
Telephone: 612-349-8500  
Facsimile: 612-339-4181  
cmadel@robinskaplan.com  
jrobbins@robinskaplan.com  
mpelikan@robinskaplan.com

*Attorneys for Defendants  
Portfolio Recovery Associates, LLC, PRA Group, Inc.,  
and Neal Stern*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

**IN RE: PORTFOLIO RECOVERY  
ASSOCIATES, LLC, TELEPHONE  
CONSUMER PROTECTION ACT  
LITIGATION**

Case No. 3:11-md-02295-JAH-BGS

Hon. John A. Houston  
Hon. Bernard G. Skomal

**Defendants Portfolio Recovery Associates, LLC,  
PRA Group, Inc., and Neal Stern's Fed. R. Civ.  
P. Rule 5.1 Notice to the United States Attorney  
General of Its Constitutional Challenge to the  
Telephone Consumer Protection Act of 1991**

///

///

///

Under Federal Rule of Civil Procedure 5.1, notice is hereby given to the Attorney General of the United States that Defendants Portfolio Recovery Associates, LLC, PRA Group, Inc., and Neal Stern (collectively “PRA”) filed an Answer in opposition to Plaintiffs’ First Amended Consolidated Complaint in which PRA questions the constitutionality of certain provisions of the Telephone Consumer Protection Act of 1991, 47 U.S.C. § 227, *et seq.* (“TCPA”).

INCLUDED WITH THIS NOTICE is a copy of PRA’s Answer.

DATED: August 14, 2015

By: /s/Jennifer M. Robbins

Christopher W. Madel, MN Reg. No. 230297  
(pro hac vice)

Jennifer M. Robbins, MN Reg. No. 387745  
(pro hac vice)

Matthew J.M. Pelikan, MN Reg. No. 393065  
(pro hac vice)

ROBINS KAPLAN LLP  
800 LaSalle Avenue  
Suite 2800  
Minneapolis, MN 55402  
Telephone: 612-349-8500  
Facsimile: 612-339-4181  
cmadel@robinskaplan.com  
jrobbins@robinskaplan.com  
mpelikan@robinskaplan.com

Michael A. Geibelson, Bar No. 179970  
ROBINS KAPLAN LLP  
2049 Century Park East, Suite 3400  
Los Angeles, CA 90067-3208  
Telephone: 310-552-0130  
Facsimile: 310-229-5800  
mgeibelson@robinskaplan.com

*Attorneys for Defendants  
Portfolio Recovery Associates, LLC, PRA Group, Inc., and  
Neal Stern*

86073437.1

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.  
ATTORNEYS AT LAW  
MINNEAPOLIS